

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC; TRIDENT ASSET  
MANAGEMENT, INC.; and MICHAEL  
DZIURGOT, individually and on behalf of  
a putative class,

*Plaintiffs,*

v.

Case No. 1:24-cv-20755-DSL

ALEBRIJE ENTERTAINMENT, LLC;  
CRAIG COLE; MATTHEW COLE; and  
GUSTAVO MONTAUDON,

*Defendants.*

**DEFENDANT CRAIG COLE’S NOTICE OF JOINDER  
IN MATTHEW COLE’S MOTION TO TEMPORARILY STAY DISCOVERY**

PLEASE TAKE NOTICE that Defendant Craig Cole joins the Motion to Temporarily Stay Discovery (ECF No. 69 (hereafter, the “Motion”)) submitted by Defendant Matthew Cole, in its entirety.

**CERTIFICATE OF CONFERRAL**

I HEREBY CERTIFY that, pursuant to Local Rule 7.1, counsel for the parties conferred concerning the matters set forth in the Motion. Plaintiffs’ counsel advised that Plaintiffs oppose the relief requested in the Motion.

Dated: July 17, 2024

Respectfully submitted,

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*Counsel for Defendant Craig Cole*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 17, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Amy M. Bowers  
Amy M. Bowers